

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2017 APR -3 P 2:54

UNITED STATES OF AMERICA

NO. 3:17-CR-189-N

DEPUTY CLERK RAW

v.

VICTOR LEOS

INFORMATION

The United States Attorney Charges:

Count One

Conspiracy to Commit False Statements in Connection with Immigration Documents
(Violation of 18 U.S.C. § 371 (18 U.S.C. §1546(a)))

1. Starting in or about August 27, 2012 and continuing through December 6, 2012, the exact dates being unknown to the government, in the Northern District of Texas, and elsewhere, defendant **Victor Leos** did unlawfully and knowingly combine, confederate, and agree with other Unnamed Coconspirators to commit a certain offense against the United States, to wit, False Statements in Connection with Immigration Documents, in violation of 18 U.S.C. § 1546.

Objective of the Conspiracy

2. The objective of the conspiracy was for defendant **Victor Leos** and Unnamed Coconspirators to devise a scheme and artifice to knowingly subscribe as true under penalty of perjury under 28 U.S.C. § 1746 false statements with respect to material facts in an application, to wit, a Department of Labor Form 9089 (Application for Permanent Employment Certification) (the "Form 9089"), that is, certifying that all

United States citizens who applied for the teaching position to which the application related were rejected for lawful job-related reasons when this was not the case.

Manner and Means

3. In furtherance of the conspiracy:

a. **Victor Leos**, in his role as Executive Director of Human Resources for Garland Independent School District ("GISD"), identified foreign teacher candidates at GISD for Form 9089 applications. **Leos** referred those candidates to the Unnamed Coconspirators, who completed the Form 9089s. **Leos** provided the Unnamed Coconspirators with materially false information to be included in the Form 9089s or their supporting documentation, which the Unnamed Coconspirators knew to be false, including the number of United States citizens who applied for the teaching positions to which each Form 9089 related, and that all United States citizen applicants for those teaching positions had been rejected for lawful job-related reasons.

Overt Acts

4. In furtherance of the conspiracy and to effect its objects and purposes, at least one of the coconspirators committed, and caused to be committed, one of the following overt acts, among others, in the Dallas Division of the Northern District of Texas, and elsewhere:

a. On or about September 27, 2012, **Victor Leos** knowingly signed a Form 9089 containing materially false representations that he caused to be submitted to the Department of Labor in furtherance of the foregoing scheme to commit an offense

against the United States.

JOHN R. PARKER
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Russell W. Fusco", is written over a horizontal line.

RUSSELL W. FUSCO
Assistant United States Attorney
Texas Bar No. 24069743
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Tel: 214-659-8600
Fax: 214-659-8802
Email: russell.fusco@usdoj.gov